

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Re: ECF No. 23238

**MOTION SUBMITTING CERTIFIED TRANSLATIONS IN CONNECTION WITH THE
COURT’S ORDER CONCERNING UNRESOLVED RESPONSES TO CERTAIN
OMNIBUS OBJECTIONS TO CLAIMS [ECF NO. 23238]**

To the Honorable United States District Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the sole Title III representative of the Debtors pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully files this motion in compliance with the Court’s *Order Concerning Unresolved Responses to Certain Omnibus Objections to Claims*, dated January 11, 2023 [ECF No. 23238 (the “Order”)] directing

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

the Oversight Board to, *inter alia*, file certified English-language translations of any Spanish-language responses that the Debtors are responding to pursuant to the Order. *See* Order at 2.

1. Attached hereto as **Exhibit 1** is a certified translation of the response [ECF No. 19830] (the “Torres Escobar Response”) filed by Arnaldo Torres Escobar (“Torres Escobar”) in response to (1) the *Three Hundred Eighty-First Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority to Employee Claims Asserting Liabilities Owed By Entities That Are Not Title III Debtors* [ECF No. 17917 (the “Three Hundred Eighty-First Omnibus Objection”)] and (2) the *Three Hundred Eighty-Second Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, The Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority to Employee Claims Asserting Liabilities Owed By Entities That Are Not Title III Debtors* [ECF No. 17920 (the “Three Hundred Eighty-Second Omnibus Objection”)].

2. Attached hereto as **Exhibit 2** is a certified translation of the response [ECF No. 19831] (the “Lugo González Response”) filed by Sandra Lugo González (“Lugo González”) in response to the *Three Hundred Eighty-First Omnibus Objection*.

3. Attached hereto as **Exhibit 3** is a certified translation of the response [ECF No. 19889] (the “Morales Martínez Response”) filed by Myra Morales Martínez (“Morales Martínez”) in response to the *Three Hundred Eighty-First Omnibus Objection*.

4. Attached hereto as **Exhibit 4** is a certified translation of the response [ECF No. 21122] (the “Cintrón González Response”) filed by Doris Cintrón González (“Cintrón González”) in response to (1) the *Three Hundred Eighty-First Omnibus Objection* and (2) the *Three Hundred Eighty-Second Omnibus Objection*.

5. Attached hereto as **Exhibit 5** is a certified translation of the response [ECF No. 21123] (the “Villanueva Correa Response”) filed by Mayra Ivelisse Villanueva Correa (“Villanueva Correa”) in response to (1) the Three Hundred Eighty-First Omnibus Objection and (2) the Three Hundred Eighty-Second Omnibus Objection.

6. Attached hereto as **Exhibit 6** is a certified translation of the response [ECF No. 21465] (the “Vega Vargas Response”) filed by Reynaldo Vega Vargas (“Vega Vargas”) in response to (1) the Three Hundred Eighty-First Omnibus Objection and (2) the Three Hundred Eighty-Second Omnibus Objection.

7. Attached hereto as **Exhibit 7** is a certified translation of the response [ECF No. 21686] (the “Santos Santiago Response”) filed by Marta E. Santos Santiago (“Santos Santiago”) in response to (1) the Three Hundred Eighty-First Omnibus Objection and (2) the Three Hundred Eighty-Second Omnibus Objection.

8. Attached hereto as **Exhibit 8** is a certified translation of the response [ECF No. 23118] (the “Fare Santiago Response”) filed by Zulma I. Fare Santiago (“Fare Santiago”) in response to the Three Hundred Eighty-First Omnibus Objection.

9. Attached hereto as **Exhibit 9** is a certified translation of the response [ECF No. 19822] (the “Vázquez Rivera Response”) filed by Evelyn Vázquez Rivera (“Vázquez Rivera”) in response to the Three Hundred Eighty-Second Omnibus Objection.

10. Attached hereto as **Exhibit 10** is a certified translation of the response [ECF No. 19880] (the “Nidya Rivera Response”) filed by Nidya Marquez Rivera (“Nidya Rivera”) in response to the Three Hundred Eighty-Second Omnibus Objection.

11. Attached hereto as **Exhibit 11** is a certified translation of the response [ECF No. 19881] (the “Valdez Peralta Response”) filed by Carmen D. Valdez Peralta (“Valdez Peralta”) in

response to (1) the Three Hundred Eighty-Second Omnibus Objection and (2) *Three Hundred Eighty-Third Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Employee Claims Asserting Liabilities Owed By Entities That Are Not Title III Debtors* [ECF No. 17922 (the “Three Hundred Eighty-Third Omnibus Objection”)].

12. Attached hereto as **Exhibit 12** is a certified translation of the response [ECF No. 19885] (the “Negrón Pérez Response”) filed by Wilfred Negrón Pérez (“Negrón Pérez”) in response to the Three Hundred Eighty-Second Omnibus Objection.

13. Attached hereto as **Exhibit 13** is a certified translation of the response [ECF No. 19894] (the “Elizabeth Rivera Response”) filed by Elizabeth Marquez Rivera (“Elizabeth Rivera”) in response to the Three Hundred Eighty-Second Omnibus Objection.

14. Attached hereto as **Exhibit 14** is a certified translation of the response [ECF No. 22358] (the “Nieves Correa Response”) filed by Arleen J. Nieves Correa (“Nieves Correa”) in response to the Three Hundred Eighty-Second Omnibus Objection.

15. Attached hereto as **Exhibit 15** is a certified translation of the response [ECF No. 22994] (the “Delgado Pérez Response”) filed by Juana M. Delgado Pérez (“Delgado Pérez”) in response to the Three Hundred Eighty-Second Omnibus Objection.

16. Attached hereto as **Exhibit 16** is a certified translation of the response [ECF No. 22995] (the “Vázquez Claudio Response”) filed by Hector M. Vázquez Claudio (“Vázquez Claudio”) in response to the Three Hundred Eighty-Second Omnibus Objection.

17. Attached hereto as **Exhibit 17** is a certified translation of the response [ECF No. 23296] (the “Sanchez Ramos Response”) filed by Osvaldo L. Sanchez Ramos (“Sanchez Ramos”) in response to the Three Hundred Eighty-Second Omnibus Objection.

18. Attached hereto as **Exhibit 18** is a certified translation of the response [ECF No. 22488] (the “Peralta Vazquez Response”) filed by Mildred E. Peralta Vazquez (“Peralta Vazquez”) in response to the Three Hundred Eighty-Third Omnibus Objection.

WHEREFORE, the Oversight Board respectfully requests that this Honorable Court take notice of the filing of these responses and certified translations in compliance with the Court’s Order.

Dated: February 2, 2023
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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